

# **EXHIBIT 19**

Confidential - Pursuant to Protective Order

Page 1

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE: JOHNSON & )  
JOHNSON TALCUM POWDER )  
PRODUCTS MARKETING )  
SALES PRACTICES AND ) MDL 16-2738  
PRODUCT LIABILITY ) (FLW) (LHG)  
LITIGATION )  
\_\_\_\_\_  
THIS DOCUMENT )  
PERTAINS TO ALL CASES )

WEDNESDAY, DECEMBER 19, 2018

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

- - -

Videotaped deposition of Laura Plunkett, Ph.D., DABT, held at the Four Seasons Hotel, 999 North 2nd Street, St. Louis, Missouri, commencing at 9:12 a.m., on the above date, before Carrie A. Campbell, Registered Diplomate Reporter, Certified Realtime Reporter, Illinois, California & Texas Certified Shorthand Reporter, Missouri & Kansas Certified Court Reporter.

- - -

GOLKOW LITIGATION SERVICES  
877.370.3377 ph | 917.591.5672 fax  
deps@golkow.com

Confidential - Pursuant to Protective Order

Page 272

1 you can extrapolate with scientific basis  
2 from one type of cancer cause to ovarian  
3 cancer with respect to the heavy metals  
4 specifically?

5 A. Well, I haven't attempted to  
6 that, because I haven't attempted to define a  
7 independent risk for each of those metals  
8 individually.

9 The issue -- the issue I have  
10 with those metals is -- there's a paragraph  
11 here where I talk about pathogenesis of  
12 carcinogenesis, where I talk about different  
13 stages of cancer development and the fact  
14 that inflammatory responses may be operating  
15 at all those different stages.

16 So the issue is you have  
17 potential -- you have compounds that are  
18 known to produce cancer or have been shown to  
19 have a potential risk of cancer. They share  
20 a similar mechanism to talc, so as a result  
21 of that, they factor into your risk  
22 assessment as far as there being an exposure  
23 to a mixture.

24 But on the issue of ovarian  
25 cancer, I'm looking at the data that's been

Confidential - Pursuant to Protective Order

Page 273

1       collected on talc itself, which would be talc  
2       with the constituents that could include the  
3       metals. But certainly I'm not saying that it  
4       is -- without the presence of one or the  
5       other of these there would be no risk of  
6       ovarian cancer. I'm not saying that either.

7           Q.       So my question is, though, can  
8       you point me either to scientific literature  
9       directly documenting that these heavy metals  
10      can cause ovarian cancer or to scientific  
11      literature that enables you to extrapolate  
12      from the types of cancer that they are known  
13      or believed to cause to ovarian cancer?

14          A.        So I -- on the issue of can I  
15       point you to the data on ovarian cancer, I'd  
16       have to go back. I can't answer that without  
17       looking at the assessments.

18                   But on the other -- second  
19       question you asked me, that's the question I  
20       was just trying to answer before. It's the  
21       idea that regardless of where the cancer is  
22       developing, the fact that these compounds  
23       have the ability to stimulate similar toxic  
24       responses in tissues could lead to a --  
25       setting up a situation where the -- where the